Registration Operation Permits

ROP Workshop Agenda

- Introduction to Registration Operation Permits (ROP)
- Who is eligible for a ROP?
- What does having a ROP mean to me?
- How do I obtain an ROP for my facility?
- Having and keeping a ROP
- Compliance with the ROP
- On-Line demo of the Application System & Assistance Resources
- Wrap up

What is a Registration Operation Permit?

A Registration Operation Permit, or ROP, is a new, standardized operation permit for use by facilities with low actual emissions.

ROP Characteristics

- Caps facility emissions at 25% of major source thresholds
- Allows changes without a construction permit
  - Must still qualify for ROP after change
  - Reports new/modified processes to air emissions inventory (AEI)
- Does not list all air pollution regulations that apply to the covered facility
  - Air pollution regulations still apply, though

ROP Characteristics

- Does not expire
- No renewals or revisions
- Simplified application and permitting process
- ROP permit template is public noticed
  - No public comment period for individual facility coverage
- DNR grants/denies coverage within 15 days of ROP application

ROP Characteristics

- Provides “safe harbor” for certain violations
  - Safe harbor = no enforcement IF
  - Facility conducts reasonable search and evaluation
    - Identify applicable air pollution regulations
    - Determine compliance with applicable air pollution regulations
  - Facility notifies DNR if it later determines violation of regulation not previously identified
  - Facility returns to compliance within 90 days

More on this later in the workshop

Facilities that could benefit from ROPs

- Facilities that have low actual emissions
- Facilities that don't expect to exceed the emission caps in the ROP
- Facilities that need to make changes quickly to meet market demands
- Facilities that get construction permits
- Facilities that are aware of (or are willing to identify) the air pollution regulations that apply to their operations

Unsuitable facilities for the ROP

- Facilities that cannot meet the ROP emission caps
- Facilities whose emissions are close to the ROP emission caps and who expect to expand
- Facilities that want all applicable air pollution regulations listed out for them
- Facilities that need source specific emission limits in their permit
  - NR 445 BACT or LAER
  - NR 424 LACT different from ROP LACT
  - Modeling limits necessary to meet air quality standards

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Who is Eligible for a ROP?

- Facilities that will keep calendar year emissions below:

Pollutant	Actual Emissions Cap[1,2]
Particulate Matter or PM10	25 tons/year
Volatile Organic Compounds	25 tons/year
Nitrogen Oxides	25 tons/year
Sulfur Dioxide	25 tons/year
Carbon Monoxide	25 tons/year
Lead	0.5 tons/year
Section 112(b) Hazardous Air Pollutants (HAPs)	2.5 tons/year for each HAP 6.25 tons/year total of all HAPs

[1] Caps can change if attainment status of facility location changes
[2] Emissions must be calculated using ROP control device efficiencies unless facility stack tested

Who is Eligible for a ROP?

- For purposes of calculating emissions to meet cap, facility must use:
  - Control device efficiencies listed in the ROP, or
  - Control efficiency based on Department approved stack test

Who is Eligible for a ROP?

- Facilities whose emission stacks have vertical, unobstructed exhaust points and are taller than nearby buildings

OR

- Facilities that demonstrate through air dispersion modeling that the criteria pollutant emissions do not and will not cause an air quality problem.

Emission Stack Requirements

- Vertical, unobstructed stacks
  - Vertical means pointing up (within 10º)
  - Unobstructed means no rain hats
- Taller than nearby buildings
  - Building is “nearby” if the stack is located within 5 building heights of the building

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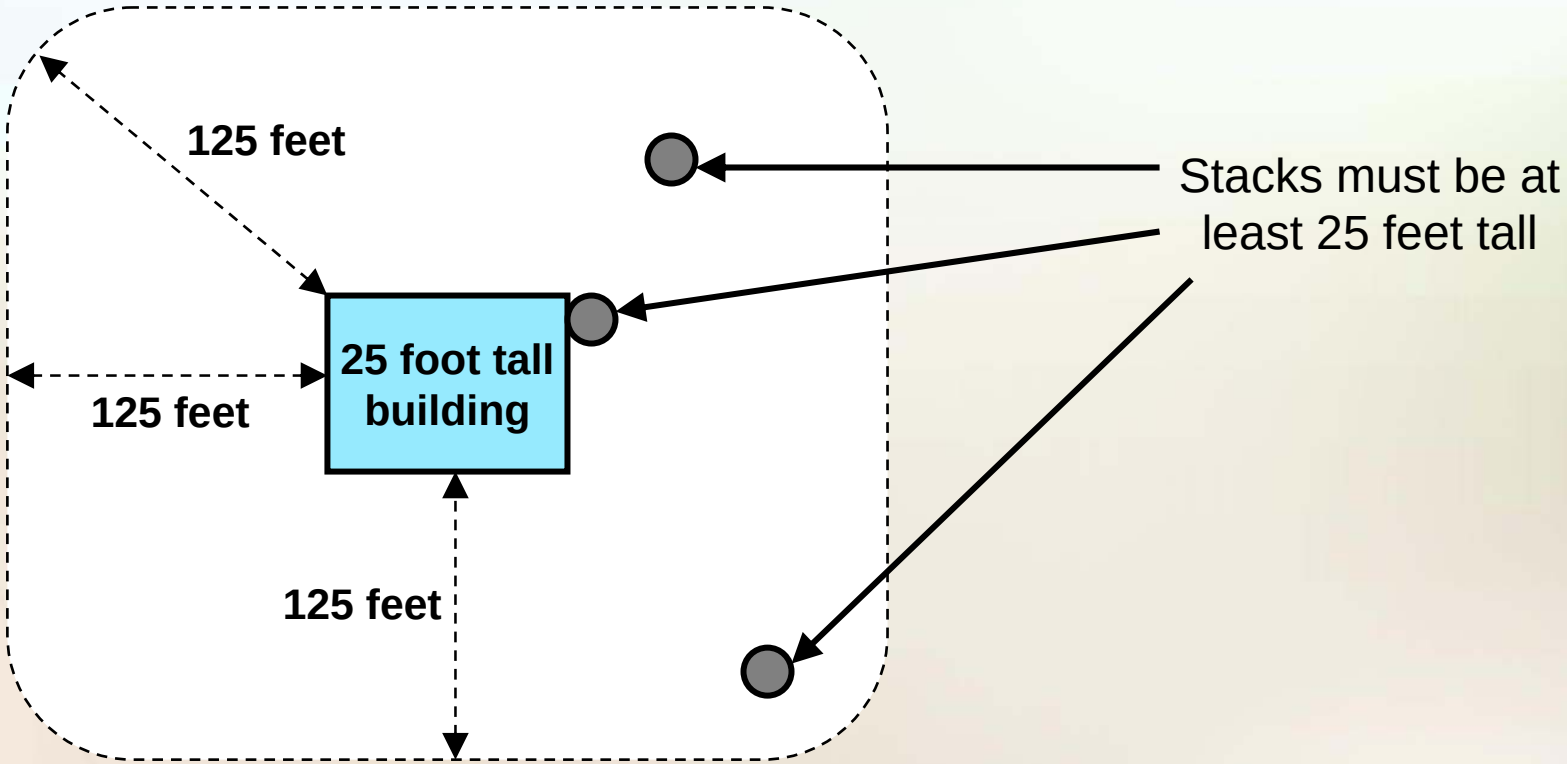
- Does not apply to general building ventilation
- Does not apply to “insignificant” emission sources
  - Listed in NR 407.05(4)(c)9.
  - E.g. Convenience water heating, space heating < 5 mmBTU/hr, MTE < application inclusion levels
- You may decide to raise a stack, add valves that open and close, modify stack so that it is vertical

Emission Stack Requirements

- Taller than nearby buildings
  - Building is “nearby” if the stack is located within 5 building heights of the building



Modeling Demonstration

- Criteria pollutants, except for VOCs
- SCREEN Model
  - Obtain a copy of model from EPA www.epa.gov/ttn/scram
  - Follow DNR guidance

http://www.dnr.state.wi.us/org/aw/air/modeling/PDF/wdnrguidance_v4.0.1.pdf

- More refined air dispersion modeling with EPA approved models (ISCST3 or AERMOD)
  - Probably need a consultant
- Save results of modeling as record of compliance. No need to submit to DNR.

Who is Eligible for a ROP?

- Facilities whose pollution control devices meet minimum efficiencies in ROP (see next slide)
  - Look at:
    - Manufacturer's data or
    - Mass balance or
    - Stack test results (if available)

Minimum Control Efficiencies

Control Device	Control Efficiency (Total Enclosure)			Control Efficiency (Hood)		
	PM	PM_{10} and PHAP	VOC and VHAP	PM	PM_{10} and PHAP	VOC and VHAP
Low efficiency cyclone	40%	20%	-	32%	16%	-
Medium efficiency cyclone	60%	40%	-	48%	32%	-
High efficiency cyclone	80%	60%	-	64%	48%	-
Multiple cyclone w/out flyash reinjection	80%	60%	-	64%	48%	-
Multiple cyclone with fly ash reinjection	50%	38%	-	40%	30%	-
Wet cyclone separator	50%	38%	-	40%	30%	-
HEPA and other wall filters (including paint overspray filters)	95%	95%	-	76%	76%	-
Fabric filters (e.g., baghouse, cartridge collectors)	98%	92%	-	78%	73%	-
Spray towers	80%	80%	70%	64%	64%	56%
Venturi scrubber	90%	85%	-	72%	68%	-
Condensation scrubber (packed bed)	90%	90%	-	72%	72%	-
Impingement plate scrubber	75%	75%	-	60%	60%	-
Electrostatic precipitators	95%	95%	-	76%	76%	-
Thermal oxidizers	-	-	95%	-	-	76%
Catalytic oxidizers	-	-	95%	-	-	76%
Condenser	-	-	70%	-	-	56%
Flaring or direct combustor	-	-	98%	-	-	78%
Biofilter	-	-	80%	-	-	64%

Who is Eligible for a ROP?

- Facilities whose existing permits and orders can be revoked
  - Facility must request revocation
  - ROP conditions must be protective of air quality standards
  - Facility is not subject to any non-allowed regulation
  - No judicial orders
  - Facility is not violating a permit condition
    - Unless coverage under ROP would resolve

More on this in "how do I apply?"

Permit/Order Revocation – Why?

- ROP is a standardized permit
  - Cannot accommodate source-specific requirements
- So that the ROP is the single compliance document for the facility
  - Reduces confusion from having multiple permits
  - Makes sense
- So that future changes at the facility won't necessitate revising or modifying existing permits
- For more information – see Revocation Fact Sheet

Who is NOT Eligible for a ROP?

- Facilities that are subject to:
  - NR 445 BACT or LAER
  - Maximum Achievable Control Technology (MACT)
  - Any New Source Performance Standard (NSPS), except those listed in ROP:
    - Small boilers
    - Petroleum liquid/VOC storage vessels
    - Grain elevators
    - Surface coating of metal furniture, large appliances or plastic parts for business machines
    - Dry cleaners
    - Nonmetallic mineral processors
    - Asphalt plants
    - Any other NSPS, where the facility is only subject to the recordkeeping or notification requirements of that standard

Who is NOT Eligible for a ROP?

- Facilities that are:
  - An acid rain source
  - A municipal solid waste combustion source
  - An infectious waste combustion source

ROP Example #1

- Existing printing facility
- No facility-wide operation permit
- Actual VOC emissions = 15 tons/year
- Actual PM emissions = 2 tons/year
- Federal HAP emissions= 1 ton/year
- Subject to NSPS for Small industrial-commercial-institutional steam generating units
- Not subject to MACT or NR 445 BACT/LAER
- Vertical, unobstructed stacks as tall as nearby buildings

✓ **GOOD CANDIDATE FOR ROP**

ROP Example #2

- Existing coating facility
- No facility-wide operation permit
- Actual VOC emissions = 15 tons/year
- Actual PM emissions = 2 tons/year
- Federal HAP emissions= 1 ton/year
- Subject to NSPS for metal coil surface coating
- Not subject to MACT or NR 445 BACT/LAER
- Vertical, unobstructed stacks as tall as nearby buildings

✓ **NOT ELIGIBLE FOR ROP…Prohibited NSPS**

ROP Example #3

- New coating facility
- Estimate actual VOC emissions ~ 18 tons/year
- Estimate actual PM emissions ~ 3 tons/year
- Estimate actual federal HAP emissions ~ 1.5 tons/year
- Not subject to NSPS, MACT or NR 445 BACT/LAER
- Vertical, unobstructed stacks as tall as nearby buildings

✓ **GOOD CANDIDATE FOR ROP**

ROP Example #4

- Existing coating facility
- Has facility-wide operation permit
- Actual VOC emissions = 10 tons/year
- Actual PM emissions = 3 tons/year
- Federal HAP emissions= 1 ton/year
- Not subject to NSPS, MACT or NR 445 BACT/LAER
- Stacks do not meet requirements, but facility modeled emissions and meets NAAQS

✓ **GOOD CANDIDATE FOR ROP**

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ROP Cost

- Facility charged $1,100 for the first calendar year they are covered under the ROP
  - $1,100 fee replaces normal emission fees for that year
  - Facility pays the $1,100 fee during next emission fee cycle
- Lower administrative costs
  - No construction permits
  - No renewals
  - No revisions

ROP Cost

- Example of potential cost savings over a 10 year period:

Facility under a Traditional Permit:	Facility under a ROP:
Actual emissions = 35 tons/year (all pollutants) @ $35.71/ton	1st year fee = $1,100
Needed 2 construction permits @ $5,000 per permit	Then, actual emissions = 35 tons/year (all pollutants) @ $35.71/ton
	No construction permits
Total air fees over 10 year period = $22,500	Total air fees over 10 year period = $12,350

SAVINGS = $10,150 + Facility Time

Ease of Use

- Flexibility to make changes without obtaining a construction permit if the facility continues to comply with all conditions of the ROP after the change
  - Allows quick changes to meet market demands
  - Saves you money – no construction permit fees
  - Saves you work – no applications to fill out
- Less frequent and less prescriptive monitoring and recordkeeping requirements.
- Simplified permit applications and 15 day permitting process.
- Having a single permit

Your Responsibilities

- Keep emissions below the ROP caps
- Comply with the other conditions in the ROP
- **Determine which air pollution regulations not listed in the ROP apply to your facility and comply with those regulations**

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When Can I Apply?

- Early November 2005 – if you don't have a valid facility-wide operation permit
- July 2006 – if you have a valid facility-wide operation permit
- Revocation of existing permits – revocation request form will be available in October. You will need to have done this before applying for the ROP

Applying for a ROP

- Very different process than applying for a traditional air permit
- Online application only
  - Prepare for applying ahead of time
  - Don't have the Internet?
    - Go to the library
    - Contact DNR service center
- No detailed stack/process/control device information asked for
  - Rely on air emission inventory (AEI) data

Web-based ROP Permit Application

- User-friendly TurboTax™ type interface
- Electronic format greatly increases DNR efficiency
  - Web-application is directly tied to DNR in-house processing software
  - Application data imported into DNR database
- All air permit applications are headed in this direction

Applying for a ROP

4 STEP PROCESS:

1. Pre-application preparation
2. Existing permit/order revocation review
3. Online ROP application
4. Post-application compliance

Applying for a ROP

1. **PRE-APPLICATION PREPARATION*****
   - Is a ROP right for your facility?
     - ROP Introduction document
     - ROP fact sheet
   - Is your facility likely eligible for a ROP?
     - Application worksheet
     - Help sections for each application question
   - If “yes” to both, move to step 2

*****Applicants cannot save online application data and come back later**

Applying for a ROP

2. REVOCATION REVIEW

- Facility submits revocation request form
  - Hardcopy (downloadable) form available in October
  - Must list all permits/orders to be revoked
- DNR reviews permits/orders for revocability
- DNR satisfies statutory notification requirement
  - 21 day notification to “interested parties”
- DNR contacts facility with revocability determination
  - If “revocable”, move to step 3.

Applying for a ROP

3. ONLINE ROP APPLICATION

- Ready in late October or early November
- Links to pre-application guidance and application worksheet
- Online application form:
  - 11 yes/no questions
  - Basic facility and contact information
  - Submit online, but print hardcopy, sign, send to DNR
    - DNR is working on electronic signatures
- DNR makes decision in 15 days

Applying for a ROP

4. POST APPLICATION COMPLIANCE

- Facility must identify and comply with all applicable air pollution regulations
  - Not all applicable regulations are in the ROP
  - Post-application guidance document
    - Living under a ROP
    - Understanding safe harbor
    - Identifying and complying with applicable regulations
  - Small Business Clean Air Assistance Program (SBCAAP)
  - DNR compliance inspectors
  - Old permits and inspection reports

Applying for a ROP

- Application materials will be posted to DNR's registration permit website
  - ROP Introduction document – Oct. 05
  - Revocation request form – Oct. 05
  - Application worksheet – Oct. 05
  - Application question help document – Oct. 05
  - Online application form – Nov. 06

http://www.dnr.state.wi.us/org/aw/air/apii/regpermits.html

ROP Processing Timeline

- Revocation review ~ 30 - 45 days
  - DNR review of existing permits/orders
  - 14/21 day notification requirement
- ROP application review = 15 days or less
- TOTAL time ~ 45 - 60 days + Facility time

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What's in the ROP?

- See DRAFT ROP permit template handout
  - ***Taking public comments through the end of the month

What's in the ROP?

- Annual emission caps for the facility
- Annual recordkeeping requirements sufficient to calculate facility emissions
- Stack parameter requirements **or** air quality modeling requirements
  - Dependent on how facility demonstrated eligibility
- Safe Harbor provision
- ***Facility must meet all other applicable requirements**

What's in the ROP?

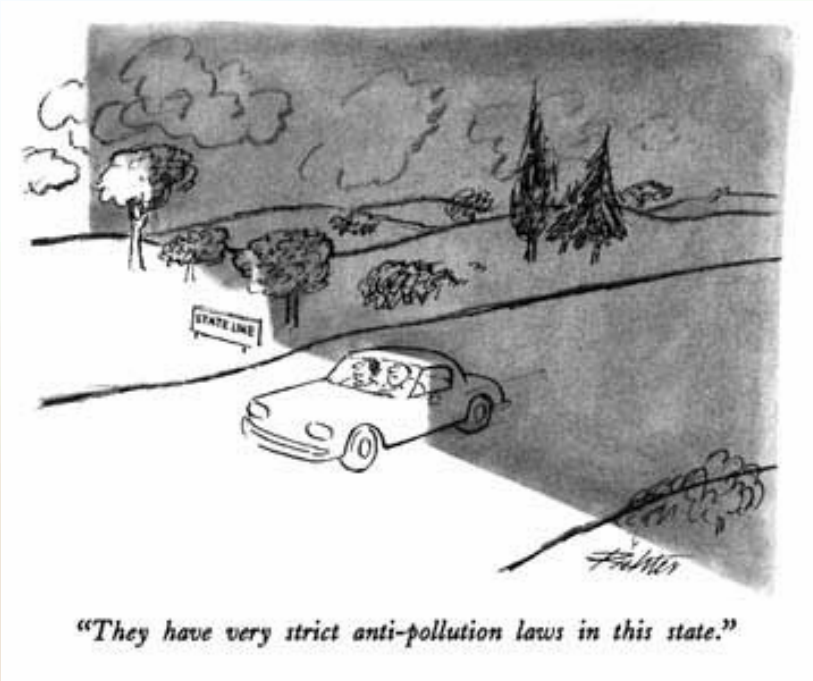
- Pollution control device monitoring and recordkeeping
  - Example – Pressure drop every 8 hours for baghouse
- Maintenance of pollution control devices
  - As recommended by manufacturer or based on good engineering practice
- Calibration of pollution control device monitoring instrumentation
  - Yearly or at a frequency based on good engineering practice

What's in the ROP?

- NR 424 requirements
  - For each non-exempt process line, facility must:
    - Control VOC emissions by 85%, OR
    - Elect to meet RACT, if line meets applicability criteria, OR
    - Apply LACT
      - 10 tons of VOC/year per process line
      - Spray coaters must use one of a number of spray technologies
      - Separate LACT for asphalt plants
- Annual combined report
  - Compliance certification
  - Summary of monitoring
  - DNR will provide a standard reporting template
  - Due date aligned with AEI

What's NOT in the ROP?

The ROP does not list all of the federal and state air pollution requirements that apply to a facility. **It is up to the permitted facility to determine what those are.**



"They have very strict anti-pollution laws in this state."

However, DNR has tools available via its website:
http://www.dnr.state.wi.us/org/aw/air/apii/regpermits.html

Keeping the ROP

- Keep your actual calendar year emissions below the ROP caps:

Pollutant	Actual Emissions Cap[1,2]
Particulate Matter or PM10	25 tons/year
Volatile Organic Compounds	25 tons/year
Nitrogen Oxides	25 tons/year
Sulfur Dioxide	25 tons/year
Carbon Monoxide	25 tons/year
Lead	0.5 tons/year
Section 112(b) Hazardous Air Pollutants (HAPs)	2.5 tons/year for each HAP 6.25 tons/year total of all HAPs

[1]Caps can change if attainment status of facility location changes
[2]Emissions must be calculated using ROP control device efficiencies unless facility stack tested

Keeping the ROP

- Keep records and do monitoring as required to comply with ROP
- Operate control devices properly
- Submit annual certification on time
- Report any new information promptly – safe harbor
- Figure out what other air pollution requirements not listed in the ROP apply

Changes rendering your facility ineligible for the ROP

- Examples:
  - Addition/modification of equipment which is subject to:
    - MACT
    - NSPS (other than those allowed)
  - Use of new materials or increased use of materials with NR 445 HAPs, triggering:
    - BACT
    - LAER
  - New stack(s) cannot meet stack parameter requirements
  - New equipment causes a predicted exceedance based on modeling
    - Need special emission limit(s)
  - Expect to exceed emission caps

Changes rendering your facility ineligible for the ROP

- What do you do if you want to make a change that renders your facility ineligible?
  - Before making change, apply for, and be issued:
    - Construction permit (unless exempt)
    - Operation permit
      - Traditional permit
      - General permit
      - Other
  - Allow for several months for DNR to issue new permits
  - Comply with ROP until new permit(s) are issued

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What records do I need to keep?

- Annual records sufficient to calculate calendar year emissions for the facility, including:
  - VOC and HAP Records
  - Material or Product Throughput Records
  - Fuel Records
  - Hours of Operation Records
- Total facility emissions
- Air pollution control device monitoring records
  - Appropriate control device parameter ranges
  - Actual measured control device parameters

What records do I need to keep?

- Stack parameter records OR air quality modeling analysis
  - Input/output files for modeling analysis
- Description and date of significant changes
  - Addition of processes, stacks or control devices
  - Physical modifications to processes or stacks
- If using control device efficiencies other than those in ROP, keep records of those stack tests
- Records retention:
  - Maintain records for at least 5 years unless otherwise stated in the permit

Reporting Requirements

- Annual combined ROP report:
  - Compliance certification
    - Identification of each permit term or condition and all applicable regulations
    - Compliance status with respect to each term or condition
    - Whether compliance was continuous or intermittent
    - Methods used for determining the compliance status
  - A summary of monitoring
- Annual Air Emissions Inventory (AEI) report
- Relocation
- New ownership/control

What regulations apply to my facility?

- Not listed in ROP, so facility must figure out
- How do I know what applies?
  - Use DNR's post-application guidance document
    - What regulations apply based on pollutant emitted/industry type
    - Simple explanation of how rule applies and then how to meet the rule
    - Links to external resources already available
  - Information provided by trade associations
  - Small Business Clean Air Assistance Program (SBCAAP)
  - Annual DNR ROP workshops
  - Old permits and inspection reports

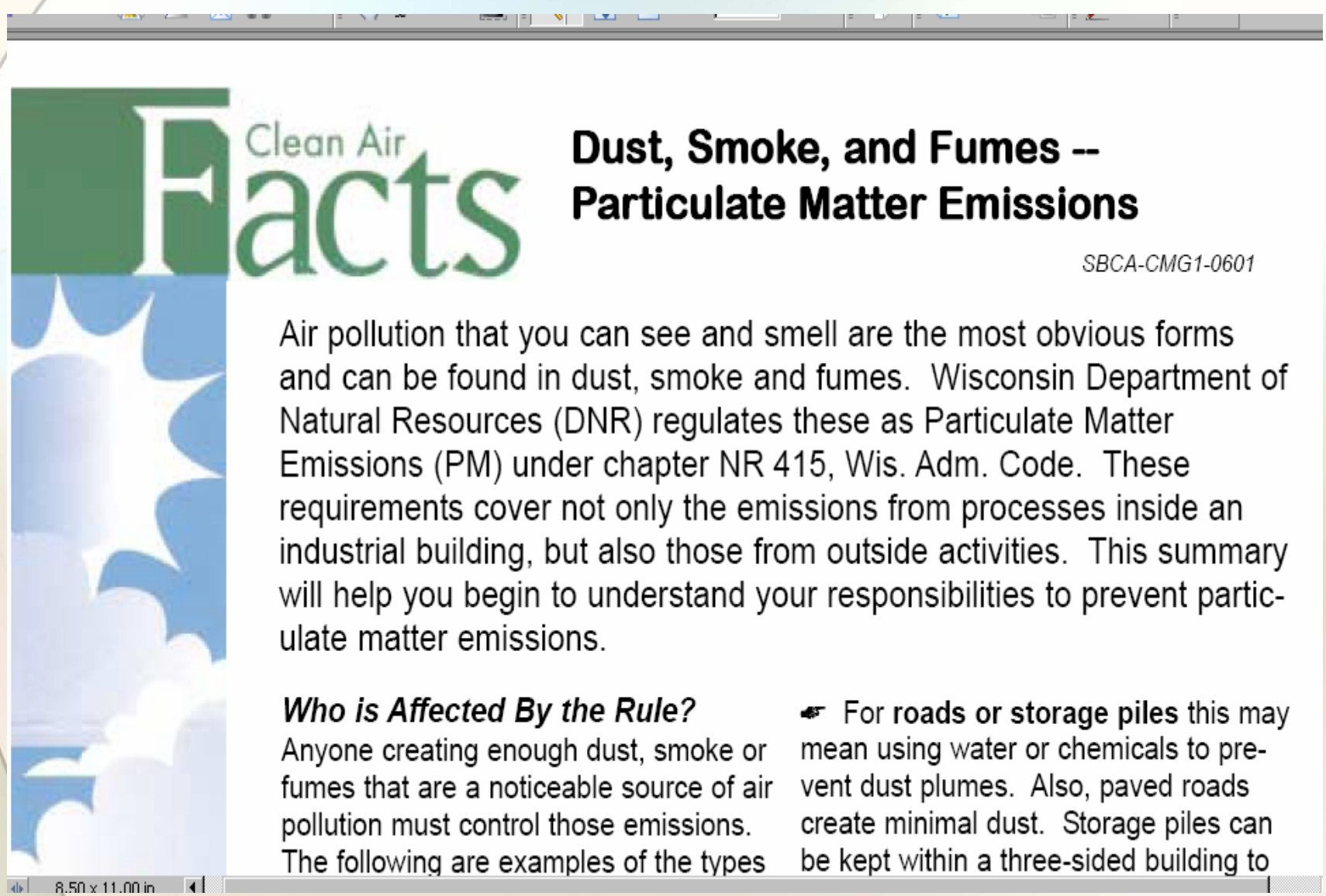
What regulations apply to my facility?

- For example, particulate matter emission rules:
  - Boilers and fuel burning units, and
  - All other processes
  - Boiler rule based on maximum heat input capacity
    - How does that relate to fuel input
    - Calculations for emission rate - spreadsheet
  - Process rule based on hourly material throughput rate and/or stack exhaust flow rate
    - Fact sheet on how to calculate

Spreadsheets

A	B	C	D	E	F	G	H	I
		FUEL EMISSIONS - ALL CRITERIA POLLUTANTS						
Fuel Calculations:								
	Max Fuel Volume/hr x EF lb pollutant/fuel volume							
EF for NG: Tables 1.4-1 and -2, AP-42								
EF for Fuel Oil: Tables 1.3-1, -2, and -3, AP-42								
	TABLE 1:	BOILER CRITERIA POLLUTANT EMISSIONS						
B01: Natural Gas = 0.013 cf6/hr; Fuel Oil = 90 gal/hr								
B02: NG = 0.008 cf6/hr; FO = 60 gal/hr								
Example: B01 NG = 0.013 cf6/hr x 3.0 lb PM/cf6 = 0.039 lb PM/hr								
Pollutant	NG EF 10-100 MMBTU	B01 Max. lb/hr	NG EF <10 MMBTU	B02 Max. lb/hr	FO EF	B01 Max. lb/hr	B02 Max. lb/hr	
PM	3	0.039	3	0.024	2	0.18	0.12	
SO2	0.6	0.0078	0.6	0.0048	71.8	6.462	4.308	
NOx	140	1.82	100	0.8	20	1.8	1.2	
VOC	2.8	0.0364	5.3	0.0424	0.2	0.018	0.012	
CO	35	0.455	20	0.16	5	0.45	0.3	
Worst Case Emissions are from Fuel Oil for each boiler, so MTE is based on those calculations:								
	TABLE 2:	MTE BOILER CRITERIA POLLUTANT EMISSIONS						
Pollutant	B01 lb/hr	B02 lb/hr	Totals lb/hr	B01 TPY	B02 TPY	Totals TPY		

Fact Sheets



Clean Air Facts

Dust, Smoke, and Fumes -- Particulate Matter Emissions

SBCA-CMG1-0601

Air pollution that you can see and smell are the most obvious forms and can be found in dust, smoke and fumes. Wisconsin Department of Natural Resources (DNR) regulates these as Particulate Matter Emissions (PM) under chapter NR 415, Wis. Adm. Code. These requirements cover not only the emissions from processes inside an industrial building, but also those from outside activities. This summary will help you begin to understand your responsibilities to prevent particulate matter emissions.

Who is Affected By the Rule?

Anyone creating enough dust, smoke or fumes that are a noticeable source of air pollution must control those emissions. The following are examples of the types

- For **roads or storage piles** this may mean using water or chemicals to prevent dust plumes. Also, paved roads create minimal dust. Storage piles can be kept within a three-sided building to

8.50 x 11.00 in

Responsibilities under Safe Harbor

If the facility identifies an applicable requirement that was previously not identified through its search and evaluation, and the facility is not, or has not been, in compliance with the requirement, the owner or operator will not be considered to be out of compliance if they do all of the following:

- Submit written notification to the Department within 21 days of identifying the applicable requirement.
- Submit documentation to the Department demonstrating that the search and evaluation that was conducted prior to identifying the applicable requirement was reasonable.
- Certify that the facility is in compliance with the applicable requirement no later than 90 days after notifying the Department of the identification of the applicable requirement. If requested, the Department may extend the deadline for achieving compliance.

Responsibilities under Safe Harbor

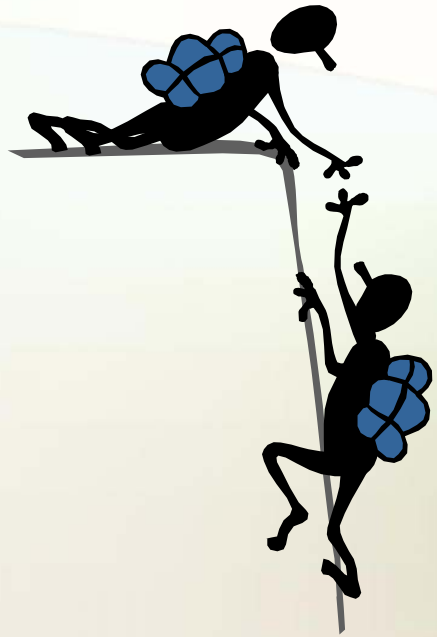
- See Example “Reasonable Search and Evaluation” documentation handout

ROP Compliance Strategy

- Why do we need one?
  - ROPs do not contain all applicable requirements
  - ROPs apply to small facilities - not always environmentally savvy; don't have staff with environmental background
  - WI statistics show small sources violate more often than large sources
- To support compliance efforts, the DNR will provide two services:
  - Compliance **Assistance**
  - Compliance **Assurance**

Compliance Assistance

Compliance Assistance is the set of actions, techniques, or programs available for regulated facilities to use to help them understand what rules apply to them and how to be in compliance with those rules



Compliance Assistance

- Post-application guidance document
  - Living under a ROP
  - Identifying and complying with applicable regulations
    - What rules apply to what pollutants/industries
    - Guidance on interpreting specific rules
  - Safe harbor guidance
- Annual workshops
  - Address common areas of non-compliance
- Small Business Clean Air Assistance Program (SBCAAP) staff
- DNR compliance inspectors
- ROP combined reporting template

Compliance Assurance

A set of methods that allow the DNR, a regulated facility, and the public to know whether or not all applicable rules and regulations are actually being followed.

Compliance Assurance

- Targeted compliance inspections
  - Statistically significant portion of registration operation permit sources – 10%
- Review of annual ROP compliance report
- Complaint response
- Enforcement of violations

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How did we do?

Please fill out and return the workshop evaluation form included in your handout packet

Thank you to our co-sponsors:
The Department of Commerce &
Wisconsin Manufacturers and
Commerce

Internet Resources

Information on ROP's
http://dnr.wi.gov/org/aw/air/apii/regpermits.html

DNR Air Permit Improvement Initiative (APII) Website
http://dnr.wi.gov/org/aw/air/apii/

Small Business Clean Air Assistance Program Website
http://commerce.wi.gov/sbcaap

Noteworthy Air Permit Acronyms

ROP – Registration Operation Permit

AEI – Air Emission Inventory

Wisconsin annual report of emissions required for companies above certain emission thresholds. Required for all facilities covered under a ROP.

LACT – Latest Available Control Techniques

Case-by-case determination which applies to certain sources of volatile organic compound emissions. Requires control techniques and operating practices demonstrating best current technology.

MACT - Maximum Available Control Technology

Maximum degree of reduction in federal hazardous air pollutants for new and existing sources set by EPA on a national level.

NSPS - New Source Performance Standards

Regulation which applies to “new sources” of air pollution at certain types of equipment/industries

NAAQS – National Ambient Air Quality Standards

A level of air quality set by the EPA which protects human health & public welfare.

More essential Acronyms

VOC - Volatile Organic Compounds

An organic compound which participates in atmospheric photochemical reactions to produce ozone. These chemicals include industrial chemicals such as benzene, and solvents such as toluene and tetrachloroethylene. Many VOCs are also hazardous air pollutants (HAP).

HAP – Hazardous Air Pollutants

Chemicals that cause serious health and environmental affects.

NR 445 BACT - Best Available Control Technology

An emission limit for a hazardous air contaminant based on the maximum degree of reduction practically achievable as specified by the department on an individual case-by-case basis taking into account energy, economic, and environmental impacts and other costs related to the source.

NR 445 LAER - Lowest Achievable Emission Rate

An emission limit for a hazardous air contaminant which reflects the most stringent of the following:

- The most stringent emission limitation for the hazardous air contaminant which is contained in the air pollution regulatory program of any state for this class or category of source, unless the applicant demonstrates this limitations is not achievable.
- The most stringent emission limitation for the hazardous air contaminant which is achieved in practice by the class or category of source.

Air Permit Definitions

Criteria Pollutants

Particulate Matter, ozone, nitrogen oxides, sulfur dioxide, carbon monoxide and lead

Attainment Area

A geographic area considered to have air quality as good or better than what the federal government has set as the acceptable level of pollutant in the air (NAAQS). A non-attainment area does not meet NAAQS.

Actual emissions

Are measured emissions coming directly from a stack or fugitive emission source to the ambient air

Thresholds

Emission levels that divide exempt & non-exempt sources, major & minor sources, etc.

Emission Cap

The maximum amount of emissions allowable for a particular facility

Safe Harbor

A way for a facility to avoid enforcement of a violation of a requirement for which the facility was not aware applied.

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